

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA	)	
	)	
v.	)	CRIMINAL NO. 04-150-A
	)	
DARLEEN A. DRUYUN,	)	
	)	

CRIMINAL INFORMATION

THE UNITED STATES ATTORNEY CHARGES THAT:

COUNT ONE

INTRODUCTION

At all times material herein, except as otherwise indicated:

1. The Department of the Air Force was a department of the executive branch of the United States Government. The office of the Secretary of the Air Force was a part of the Department of the Air Force.
2. The defendant Darleen A. Druyun was a member of the Senior Executive Service (SES) and Principal Deputy Assistant Secretary of the Air Force for Acquisition and Management from 1993 until on or about November 15, 2002.
3. The defendant, as the Principal Deputy Assistant Secretary of the Air Force for Acquisition and Management, supervised, directed and oversaw the management of Air Force acquisition programs and provided advice on acquisition matters to the Assistant Secretary of the Air Force for Acquisition, the Chief of Staff of the Air Force, and the Secretary of the Air Force. She chaired the Acquisition Professional Development Council which was responsible for recruiting, training, and retaining military and civilian acquisition personnel. She also was

chairperson of the NATO Airborne Early Warning and Control Program Management Board of Directors which managed the multi-billion dollar NATO E-3A program funded by twelve nations.

4. In January 2002, Congress approved the Department of Defense and Emergency Supplemental Appropriation for Recovery From and Response to Terrorist Attacks on the United States Act. Section 8159 of this act authorized the Air Force to make payments on a multi-year program for leasing not more than 100 general purpose Boeing 767 aircraft. Following a Request for Information in March 2002, the Boeing Company was selected by the Air Force as the sole source for negotiations to lease 100 Boeing KC 767A tanker aircraft. The defendant, in her position as Principal Deputy Assistant Secretary of the Air Force for Acquisition and Management was responsible for overseeing the negotiations. The defendant oversaw the negotiation of the leasing of these aircraft from Boeing until her disqualification on November 5, 2002.

### THE CONSPIRACY

From on or about September 23, 2002 through on or about November 5, 2002, in the Eastern District of Virginia, and elsewhere, Darleen A. Druyun, the defendant herein, did knowingly combine, conspire, confederate and agree with other persons to commit an offense against the United States of America, to wit:

To knowingly, intentionally and willfully participate personally and substantially as a government employee through decision, approval, recommendation, the rendering of advice, investigation and otherwise, in a contract and other particular matter, in which to her knowledge the Boeing Company, a company with whom she was negotiating concerning prospective

employment, had a financial interest in violation of Title 18, United States Code, Section 208(a) and 216(a)(2).

### OVERT ACTS

In furtherance of the conspiracy and to effect the objects thereof, the following overt acts, among others, were committed in the Eastern District of Virginia and elsewhere:

1. On or about September 23, 2002 an E-mail was sent by the daughter of the defendant to a “senior executive” at the Boeing Company outlining the type of employment position the defendant would be interested in being offered by Boeing.

2. On or about October 5, 2002 a “senior executive” of the Boeing Company contacted the defendant by telephone to schedule an October 17, 2002 meeting between them in Orlando, Florida, to discuss employment.

3. On or about October 17, 2002 the defendant and a “senior executive” from the Boeing Company met in Orlando, Florida to discuss the hiring of the defendant by the Boeing Company.

4. On or about October 22, 2002 at the Pentagon in Arlington, Virginia, the defendant met with other government officials and participated personally and substantially in discussions concerning the terms and conditions of the KC 767A tanker lease from the Boeing Company.

(All in violation of Title 18, United States Code, Sections 371)

Respectfully submitted,

Paul J. McNulty  
United States Attorney

By:

Robert W. Wiechering

Assistant United States Attorney